

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**In re:**

**DAVID LAURENCE LONG,**

**CHAPTER 13**

**DEBTOR.**

**CASE NO. 25-10298-BFK**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

**NOTICE**

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

**IF YOU DO NOT WISH THE COURT TO SUSTAIN THE OBJECTION SOUGHT HEREIN, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE OBJECTION, THEN YOU MUST ATTEND THE HEARING ON THIS MATTER, OTHERWISE, THE COURT MAY DEEM OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED, AND ISSUE AN ORDER SUSTAINING THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

**THE HEARING IS SCHEDULED TO BE HELD ON MAY 8, 2025 AT 1:30 PM AT THE U.S. BANKRUPTCY COURT, ALEXANDRIA DIVISION, 200 S. WASHINGTON STREET, 2ND FLOOR, IN COURTROOM NUMBER I, ALEXANDRIA, VA 22314.**

**COMES NOW**, NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for Deutsche Bank Trust Company, as Trustee for Morgan Stanley Mortgage Loan Trust 2005-6AR, Mortgage Pass-Through Certificates, Series 2005-6AR ("Secured Creditor"), by Counsel, and objects to the confirmation of the Chapter 13 Plan (the "Plan") and in support thereof, represents unto the Court:

1. Secured Creditor has a claim against the property of the Debtor located at 42666 Frontier Drive, Ashburn, VA 20148 by virtue of the Note and accompanying Deed of Trust.
2. Secured Creditor is currently in the process of filing a Proof of Claim in this case, which will establish a total debt of approximately \$555,924.34, due as of February 19, 2025, including pre-petition arrears of approximately \$38,913.29.
3. The Plan appears to be underfunded, as the arrearages owed to this Secured Creditor are understated, with the Plan providing for only \$30,000.00 in pre-petition arrears.
4. Secured Creditor objects due to the deficiency in the filed Plan.

5. Any Chapter 13 Plan proposed by the Debtor must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this Secured Creditor. It is respectfully requested that this Court deny confirmation of the Plan.

**WHEREFORE**, the undersigned requests as follows:

1. That confirmation of the proposed Plan be denied.
2. For such other relief as this Court deems proper.

NewRez LLC d/b/a Shellpoint Mortgage  
Servicing as servicer for Deutsche Bank Trust  
Company, as Trustee for Morgan Stanley  
Mortgage Loan Trust 2005-6AR, Mortgage  
Pass-Through Certificates, Series 2005-6AR

/s/Daniel J. Pesachowitz

By: \_\_\_\_\_

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#### CERTIFICATE OF SERVICE

I certify that on April 1, 2025, the foregoing Objection was served via CM/ECF on Thomas P. Gorman, Trustee, and Daniel M. Press, Counsel for Debtor, at the email addresses registered with the Court, and that a true copy was mailed via first class mail, postage prepaid, to David Laurence Long, Debtor, 42666 Frontier Drive, Ashburn, VA 20148.

/s/Daniel J. Pesachowitz

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Daniel J. Pesachowitz, Esquire  
Samuel I. White, P. C.